

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

DON HENDRICKSON,)	CASE NO.
)	
Plaintiff,)	
)	
V.)	
)	
UNITED OF OMAHA LIFE)	COMPLAINT
INSURANCE COMPANY,)	
)	
Defendant.)	

PLAINTIFF STATES:

1. Plaintiff is a resident of Hastings, Adams County, Nebraska.
2. Defendant is a corporation organized under and existing by virtue of the laws of the State of Nebraska and at all times material herein was conducting insurance business in Omaha, Douglas County, Nebraska.
3. At all times material herein Plaintiff was married to Susan Hendrickson, who is now deceased but at all times material herein was a resident of Hastings, Adams County, Nebraska.
4. Prior to her death, Susan Hendrickson purchased a contract of life insurance from United of Omaha Life Insurance Company.
5. Said contract of life insurance was in full force and effect at the time of Susan Hendrickson's death on July 19, 2012.
6. Said contract of life insurance provided for a payment of \$119,000.00 at the time of Susan Hendrickson's death. This payment was to be made to the named beneficiary in the contract of insurance.
7. Said contract of life insurance named the Plaintiff, Don Hendrickson, as the beneficiary.

EXHIBIT A

8. Susan Hendrickson died on July 19, 2012.

9. After Susan Hendrickson's death on July 19, 2012, Don Hendrickson contacted the Defendant regarding the aforementioned contract of insurance and requested that payment be made to him pursuant to the contract of insurance. Defendant refused to make payment.

10. Despite repeated requests for payment, Defendant has continued to refuse to make payment on the contract of life insurance purchased by Susan Hendrickson before her death.

11. Plaintiff has fulfilled every condition precedent pursuant to the contract of insurance before filing this lawsuit, including, but not limited to following the procedural appeal process with Defendant as provided for in the contract of life insurance.

12. Defendant's denial of payment is a breach of the contract of life insurance that Susan Hendrickson had with Defendant on the date of her death.

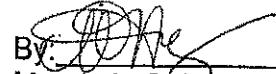
13. Plaintiff, as a named beneficiary of said contract of insurance has standing to bring this lawsuit.

14. Plaintiff has suffered monetary damages as a result of Defendant's breach of contract.

WHEREFORE, Plaintiff prays for judgment against the Defendant for his damages and such other relief as may be allowed by the State of Nebraska.

Dated this 9 day of June, 2015.

DON HENDRICKSON, Plaintiff,

By 
Mandy L. Strigenz, #20208
SIBBERNSEN, STRIGENZ,
& SIBBERSEN, P.C.
304 Olson Drive, Suite 211
Papillion, Nebraska 68046
(402) 493-7221

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

DON HENDRICKSON,) Case No.:
)
 Plaintiff,)
)
 v.) PRAECIPE
)
 UNITED OF OMAHA LIFE)
 INSURANCE COMPANY,)
)
 Defendant.)

Please issue a Summons for Service by Certified Mail upon the following Defendant:

United of Omaha Life Insurance Company
c/o Mutual of Omaha Insurance Company,
General Counsel
Mutual of Omaha Plaza
Omaha, Nebraska 68175

Please e-mail said Summons to mandy@sibbandstrig.com or
Stacey@sibbandstrig.com

Dated this 9 day of June, 2015.

DON HENDRICKSON, Plaintiff

BY: Mandy L. Strigenz

Mandy L. Strigenz, #20208
SIBBERNSEN, STRIGENZ
& SIBBERNSEN, P.C.
304 Olson Drive, Suite 211
Papillion, Nebraska 68046
mandy@sibbandstrig.com
(402) 493-7221
ATTORNEY FOR PLAINTIFF

Image ID:
D00325822D01

SUMMONS

Doc. No. 325822

IN THE DISTRICT COURT OF Douglas COUNTY, NEBRASKA
1701 Farnam
Omaha NE 68183

Don Hendrickson v. United of Omaha Life Ins

Case ID: CI 15 5085

TO: United of Omaha Life Ins
DBA: c/o Mutual of Omaha Ins.

FILED BY
Clerk of the Douglas District Court
06/09/2015

You have been sued by the following plaintiff(s):

Don Hendrickson

Plaintiff's Attorney: Mandy L Strigenz
Address: 304 Olson Drive, Suite 211
Papillion, NE 68046

Telephone: (402) 493-7221

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Date: JUNE 9, 2015

BY THE COURT:

John M. Friend
Clerk



PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

United of Omaha Life Ins
Mutual of Omaha Plaza
Omaha, NE 68175

Method of service: Certified Mail

You are directed to make such service within ten days after the date of issue, and file with the court clerk proof of service within ten days after the signed receipt is received or is available electronically, whichever occurs first.

U.S. POSTAL SERVICE
CERTIFIED MAIL

Doc. No. 325822

IN THE DISTRICT COURT OF DOUGLAS
COUNTY, NEBRASKA
Douglas County Courthouse
1701 Farnam Street
Omaha, Nebraska 68183

To: Don Hendrickson v. United of Omaha Life Insurance Company CI 15-5085
Case ID:

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

UNITED OF OMAHA LIFE
INSURANCE COMPANY
C/O MUTUAL OF OMAHA
INSURANCE COMPANY
MUTUAL OF OMAHA PLAZA
OMAHA, NEBRASKA 68175

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

Agent
 Addressee

B. Received by (Printed Name)

JENKINS

C. Date of Delivery

06/23/2015

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

93 RECD JUN 15 2015

3. Service Type

Certified Mail® Priority Mail Express™
 Registered Return Receipt for Merchandise
 Insured Mail Collect on Delivery

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number

(Transfer from service label)

7012 0470 0001 1836 8565

PS Form 3811, July 2013

Domestic Return Receipt

(Deliver to authorized person)

**CERTIFIED MAIL
PROOF OF SERVICE**

Copies of the Summons were mailed by certified mail,
TO THE PARTY: United of Omaha Life Insurance Company

At the following address: c/o Mutual of Omaha Insurance Company

Mutual of Omaha Plaza

Omaha, Nebraska 68175

on the 9th day of June 2015, as required by Nebraska state law.

[Signature]
Postage \$ 9.70 Attorney for: Plaintiff

The return receipt for mailing to the party was signed on June 15, 2015.

To: United of Omaha Life Insurance Company
c/o Mutual of Omaha Insurance Company
Mutual of Omaha Plaza
Omaha, Nebraska 68175

From: Mandy L. Strigenz
Sibbernson, Strigenz & Sibbernson, P.C.
304 Olson Drive, Suite 211
Papillion, Nebraska 68046

ATTACH RETURN RECEIPT & RETURN TO COURT



www.sibbandstrig.com

Westroads Office Park
1111 N. 102nd Court, Suite 330
Omaha, NE 68114

Sarpy County Office
304 Olson Drive, Suite 211
Papillion, NE 68046

Office: (402) 493-7221
Fax: (402) 397-3515

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June 18, 2015

Sullivan & Sharonda Lewis
3030 Nicholas Street
Omaha, Nebraska 68131

RE: Lewis v. Leonard Smith
Date of Loss: January 16, 2015

Dear Sullivan and Sharonda:

Please call me upon receipt of this letter. I tried to call you but the phone number I have for you (402-415-6171) was disconnected.

The insurance company is offering \$25,000.00 to settle your claim. The State of Nebraska is asserting a subrogation interest for the medical bills they paid and this will be significantly larger than the \$25,000.00. As such, it is important to find Underinsured Motorist Coverage information if possible. Please let me know if you have found that?

I look forward to speaking with you.

Thank you.

Very truly yours,

A handwritten signature of Mandy L. Strigenz.

Mandy L. Strigenz

MLS/slg